

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VERNETTE WALKER,)	
)	
Plaintiff,)	
)	Civil Action No. 06-138-MPT
v.)	
)	
THE NEWS JOURNAL and ANN HINES,)	
)	
Defendants.)	
)	

THE NEWS JOURNAL'S RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), defendant The News Journal ("News Journal") submits the following Rule 26(a)(1) Initial Disclosures. The News Journal's investigation, research and analysis of the facts and issues in this case are ongoing. Therefore, the News Journal reserves the right to supplement, amend or correct all parts of this Initial Disclosure Statement. The News Journal further reserves all objections to the admissibility of any information that may be requested hereunder, including objections with respect to privilege, work product, relevance or materiality.

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

Based upon information reasonably available to the News Journal at the present time, the News Journal identifies the following as individuals likely to have discoverable information that the News Journal may use to support its claims or defenses, unless solely for impeachment:

1. Dolores Pinto
The News Journal
950 W. Basin Road
New Castle, DE 19720

Ms. Pinto is likely to have discoverable information relating to Ms. Walker's employment, leave, termination, and the News Journal's personnel decisions.

2. Ann Hines
The News Journal
950 W. Basin Road
New Castle, DE 19720

Ms. Hines is likely to have discoverable information relating to Ms. Walker's employment, leave, termination, and the News Journal's personnel decisions.

3. Shelly Rumpf
The News Journal
950 W. Basin Road
New Castle, DE 19720

Ms. Rumpf is likely to have discoverable information relating to Ms. Walker's employment, leave, termination, personnel decisions in her department.

4. Dr. Linda Surdo
Concentra Medical Center
4110 Stanton-Ogletown Road
Newark, DE 19713

Dr. Surdo is likely to have discoverable information relating to Ms. Walker's medical condition and her ability to return to work.

The News Journal does not consent to, or authorize, communication by the plaintiff with the News Journal's employees. News Journal employees may be contacted through undersigned counsel. The News Journal reserves the right to seek discovery from, and relating to, other persons that may become known as persons likely to have discoverable information relevant to the disputed facts. In addition, the News Journal reserves the right to designate and/or call additional witnesses at trial.

II. RELEVANT DOCUMENTS AND TANGIBLE THINGS

In accordance with Federal Rule of Civil Procedure 26(a)(1)(B), the News Journal identifies the following categories of documents, data compilations and tangible things in its possession that the News Journal may use to supports it claims or defenses, unless solely for impeachment. This disclosure does not constitute an admission as to the relevance or

admissibility of the identified materials or a waiver of attorney-client or work product privilege, or other applicable protection or immunity.

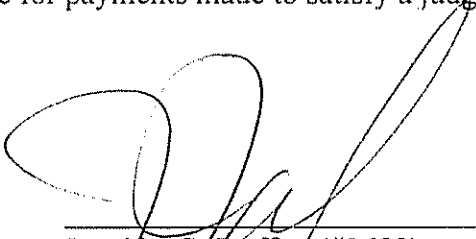
1. Relevant personnel records;
2. Correspondence relating to personnel decisions;
3. Documents reflecting communications with Ms. Walker; and
4. Medical records relating to Ms. Walker.

III. COMPUTATION OF DAMAGES

Not applicable.

IV. INSURANCE AGREEMENTS

The News Journal is not aware of any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy a judgment.



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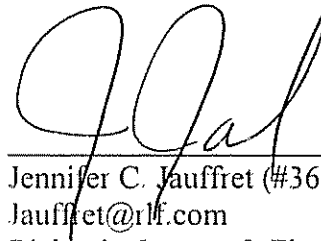
Dated: April 23, 2007

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2007, I electronically filed the foregoing Rule 26(a)(1) Initial Disclosures with the Clerk of Court using CM/ECF which will send notification of such filing to the following and on April 23, 2007, mailed, via first class mail, postage prepaid, copies of the same to:

Vernette Walker
29 Richard Road
New Castle, Delaware 19720
Pro Se Plaintiff

A handwritten signature in black ink, appearing to read 'J. Jauffret', is written over a horizontal line.

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